

CITY OF TOPPENISH

21 West First Avenue
Toppenish, WA 98948

"Where the West Still Lives"

May 26, 2023

Ms. Susan Poulson and Mr. Brian Nickel
Water Division, NPDES Permitting Section
US EPA Region 10
1200 Sixth Avenue, Suite 155
Seattle, Washington 98101

Subject: Public Notice Comments: NPDES Permit No. WA0050202
Washington Beef, LLC - Toppenish Plant

Dear Ms. Poulson and Mr. Nickel:

The purpose of this letter is to comment on the recently issued Washington Beef NPDES Permit No. WA0050202. Washington Beef has been an important employer in our city for many years, providing excellent job opportunities to thousands of local residents and sponsoring and supporting several community organizations.

The city recognizes that the Environmental Protection Agency (EPA) has an important role to play in protecting water quality. However, Washington Beef has been a responsible environmental steward as shown by their excellent compliance history. We understand the EPA has not cited Washington Beef for violations or other problems with water quality. We are concerned that the EPA's recent permit will have a profound effect on Washington Beef and may require them to consider operations elsewhere. If Washington Beef is forced to close or relocate its plant because of the proposed regulations, it would have a devastating effect on the City of Toppenish. The City of Toppenish has a high minority population and a low median household income. Per census data, the population of Toppenish is 84% Hispanic, 9% Native American, and 6% other nationalities. 16% of the population lives in poverty and 62% of the community is classified as low-to-modern (LMI) income per the HUD standards. Thus, it is important that we retain good jobs in the City of Toppenish and continue to partner with Washington Beef for our community needs.

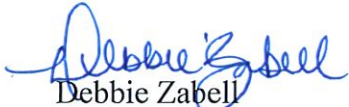
The City is concerned that regulations are being applied to Washington Beef outside of the normal regulatory process and are inconsistent with practices of the Washington State Department of Ecology. The EPA's proposed changes in applicable water quality standards is alarming and would not appear to be consistent with past practices. The standards, which seem to be both unattainable and unnecessary, put Washington Beef and our economy at risk. The loss of such a vital employer and contributor the City of Toppenish would have far-reaching consequences for our city.

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The City urges the EPA to reconsider the draft Permit and work with Washington Beef to issue a permit that not only protects water quality, but also protects the jobs and economy of the City of Toppenish. We understand the need to protect our environment and we fully support those efforts when they can be done in a partnership that is based sustainable solutions in line with how the facility has been regulated historically and consistent with other practices in Washington State. This approach would continue to protect our environment while also preserving the economic benefits that Washington Beef provides to our city.

Thank you for considering accepting these comments for the administrative record.

Sincerely,


Debbie Zabell
City Manager

cc: Craig Smith, Washington Beef